et al. (hereinafter referred to as "*Owens*"). In making the rejection, the Examiner has maintained and incorporated the rejections set forth in the previous Office Action. The applicants respectfully maintain and incorporate their responses to the rejection set forth hereinabove and set forth in the previous Office Action.

In furthering the rejection, the Examiner states that:

(A) Applicant argues that prior art does not teach the limitation of 'uploading a set of data from the client data processing system to the host data processing system'.

As to point (A), Examiner respectfully disagrees. Examiner believes that this feature was taught by Carroll. Carroll teaches the same functionality corresponding to a data rating in a carrier management system. Moreover, Carroll also teaches that when the application is completed at the user station 10, it will be forwarded to the data center 14 for processing [see fig. 1, and col. 6, lines 57-68].

The applicants respectfully submit that the Examiner is arguing the result of the steps taken by *Carroll* to achieve an end and is not addressing the steps themselves; and, it is the steps that comprise the applicants' claimed invention. The Examiner has merely stated a conclusion in determining a rejection and has not addressed the applicants' detailed remarks with respect to traversal of the Examiner's conclusion.

Carroll, in column 6, lines 57-59, teaches that a representative of the carrier forwards an order form to a data center. The process of forwarding can be completed via a transmission medium such as facsimile. Upon receipt of the order form, the data center verifies the authority of the sender and, upon approval, must

then convert the data contained in the order form into an appropriate update format. The process of *Carroll* is not the process of the instant application.

The applicants claimed invention transfers object tables from a client to a host; the process is transparent to a system user. Indeed, a system user would be incapable of locating an object and transferring it anywhere. Further, the data of Carroll must be parsed in some form by the data center; this is not equivalent to the uploading of an object table that comprises objects that further comprise a set of functions performed by the object.

The use of objects to carry data, store instructions, provide functionality, and establish their own interface through stored instructions, provides value to objects that was never possible with stored table data such as is found in *Carroll*. Additionally, *Carroll* neither taught nor disclosed that a set of data objects within a Data Access System could be updated; this fundamental element is part of the applicants' preamble to claim 1 because the object oriented programming environment, which was never contemplated by *Carroll*, serves as the basis for the data processing environment of the applicants' claimed invention. If *Carroll* neither taught, nor even suggested, that object oriented programming was possible, let alone that it was advantageous in saving time and memory resources within its host system, then *Carroll* can't support the Examiner's premise that *Carroll* teaches the invention substantially as claimed.

The applicants respectfully submit that *Carroll* never uploaded object tables as is claimed in the applicants claim 1(b) because *Carroll* was not designed to do anything with objects or to function within an object oriented environment. And, clearly objects and table data are not analagous. Therefore, if *Carroll* couldn't use the objects, then *Carroll* had no need to upload object tables.

Additionally, the Examiner further stated in support of the rejection that:

(B)   Applicant argues that Carroll does not teach updating a set of data objects.

As to point (B), Examiner respectfully disagrees. Carroll teaches updating data contained in the order form 18 in the data center 14 into an appropriate update format before sending back to the user station [col. 7, lines 3-30].

and,

(C)   Applicant argues that Carroll does not teach an object oriented environment.

As to point (C), Examiner respectfully disagrees. In the Previous Office Action, Examiner admits that [the] Carroll does not explicitly teach an object oriented environment although it has the same functionality of processing data in a carrier management system. However, Owens reference teaches forwarding an object-oriented application from the client 101 to the object server 105 [see fig. 3]. The object server then generates appropriate tables and column for a relational database scheme automatically [see the abstract].

The applicants respectfully respond to points (B) and (C) together as they both refer to whether or not *Carroll* teaches an object oriented environment.

In making the rejection, the Examiner has stated that *Carroll* teaches the updating of data objects and that *Carroll* teaches an object oriented environment. Neither of which remarks is supported by the *Carroll* disclosure. Nowhere in *Carroll* is there any reference, citation or implication of the use, or creation of an object as such is known in the data processing arts. Object oriented programming as defined by the applicants (see the Specification page 6, line 20, through page 7, line 25), and as is known in the programming arts, utilizes a basic element known as an "object". Objects can contain both a data structure and one or more intended behavior characteristics. Each object knows how to perform some activity. *Carroll* simply does not teach nor imply the use of object oriented programming. Indeed, the Examiner refutes the Examiner's own disagreement with the applicants' arguments by stating that: "Examiner admits that [the] Carroll does not explicitly teach an object oriented environment although it has the same functionality of processing data in a carrier management system." It is the efficiency of the applicants' claimed invention that sets it apart from *Carroll* with respect to the generalized result of processing carrier data. That efficiency is derived from a different architecture, a different series of implementing steps and greater speed and flexibility.

The applicants respectfully submit that the properties attributed to *Carroll* by the Examiner are simply not possible within the limited data structures available to *Carroll*.

The Examiner has thus established that *Carroll* does not teach an object oriented environment; and, as *Carroll* does not explicitly teach the applicants' preamble, or any of elements 1(b), 1(c), 1(d), 1(e), 1(f), or 1(g), the Examiner has proposed that it would have been obvious to one of ordinary skill in the art to add the object oriented database of *Owens* into the data processing system of *Carroll* to accomplish what the applicants have done.

In rejecting claim 1 under 35 U.S.C. §103(a), the Examiner has stated that "Owens teaches mapping data according to an object-oriented scheme to [store] data in persistent memory according to a relational database scheme so that the object-oriented scheme generated by a user may be efficiently stored ..." (fig. 6; col. 2, lines 42-43).

The applicants respectfully agree that *Owens* teaches an object oriented programming environment in which an object oriented database defines payment resources; however, the presence of an object oriented environment is where the similarity with the applicants' present invention ends.

Owens defines the object to be stored within the *Owens* system as:

a container object that allows a user to define new payment resources without requiring the user to redesign a relational database system used for persistent storage of transaction information. An object server maps data that is represented in transient memory according to an object-oriented scheme to [store] data that is represented in persistent memory according to a relational database scheme. (*Owens* at col. 2 line 63 through col. 3, line 13.)

Whereas, the object environment of the applicants' claimed invention is specifically limited to a system wherein the client transmits its set of object tables to a host for updating and wherein the updated obect tables form the basis of a new set of tables to be transmitted back to the client. *Owens* does not teach that objects within the database can be presented, updated, recreated, and then retransmitted back to the originator. *Owens* is merely concerned with storage (*Owens* at column 7, lines 32-44).

The applicants respectfully submit that the Examiner has not established a prima facie case of obviousness as is required under §103.

To establish a prima facie case of obviousness under §103, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. (*MPEP* at 2142 and 2143). The teaching or suggestion to make the claimed invention and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. (*MPEP* at 2143).

The applicants' present application cannot, therefore, be obvious over *Carroll* in view of *Owens* because neither reference alone nor together with the knowledge generally available teaches nor suggests the applicants' claimed invention; it also would not be obvious to one of ordinary skill in the art to modify *Carroll* and/or *Owens* to achieve what the applicants have achieved. And, even if one of ordinary skill in the art were motivated to modify *Carroll* and/or *Owens* the result would not be the applicants' claimed invention as per the Remarks made hereinabove or absent impermissable hindsight. The result would be a rating scheme storing one or more objects that contain data but no enabling functionality or the interface capability necessary to implement the functionality within a carrier management system. Therefore, the applicants submit that the applied references do not provide the necessary suggestion to modify and/or combine their teachings as per the above Remarks; thus, the claimed invention can not be considered obvious over such a modification or combination in the absence of such a suggestion.

Claims not specifically discussed above are believed allowable at least for the reasons advanced with respect to the claims from which they depend. Therefore, the applicants respectfully submit that the Examiner's rejection of claims 1-5 under 35 USC §103(a) is traversed by the Remarks made hereinabove.
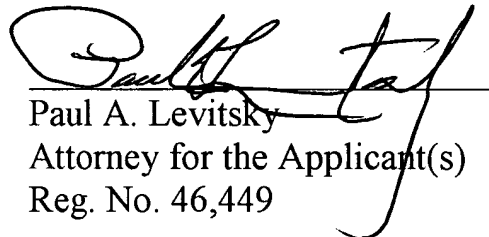
(2)(b) In rejecting claim 6, the Examiner further stated that: "... Carroll teaches the invention substantially as claimed ...".

The applicants incorporate the arguments raised in the Remarks hereinabove with respect to the rejection by the Examiner of claims 1-5 under §103(a).

Claims not specifically discussed above are believed allowable at least for the reasons advanced with respect to the claims from which they depend. Therefore, the applicants respectfully submit that the Examiner's rejection of claims 6-10 under 35 USC §103(a) is traversed by the Remarks made hereinabove.

(3)   In view of the above Remarks, the applicants submit that the subject application is in condition for allowance, and further examination and reconsideration of the Final Rejection are respectfully solicited.

Respectfully submitted,

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